

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARIA THERESA NOBLE,

Plaintiff,  
-against-

MOUNT OLIVET CHURCH, INC., aka MOUNT  
OLIVERT CHURCH, INC., aka MOUNT OLIVER  
CHURCH INC., aka MOUNT OLIVE CHURCH INC.,  
and ARACELIS STAATZ, as Trustee of Mount Olivet  
Church,

Defendants.

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MOUNT OLIVET CHURCH, INC. and ARACELIS  
STAATZ, as Trustee of Mount Olivet Church,

**18-CV-07871-NRB**

Third-Party Plaintiffs,

**NOTICE OF MOTION**

-against-

LEDWIN OVIEDO, LEDWIN ENTERPRISES, INC.,  
JAMIE RAMIREZ, ESQ. and LAURA C. BROWNE,  
ESQ.,

Third-Party Defendants.

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**PLEASE TAKE NOTICE** that, upon the annexed affirmation of Joseph L. Francoeur dated August 21, 2020 and the exhibits thereto, the accompanying memorandum of law, and all the prior pleadings and proceedings herein, third-party defendant, LAURA C. BROWNE, ESQ., will move this Court before the Hon. Naomi Reice Buchwald, U.S.D.J., at the Courthouse located at 500 Pearl Street, New York, New York 10007-1312, on a date to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b), dismissing the Amended Third-Party

Complaint for its failure to state claims upon which relief can be granted, and granting such other, further, and different relief as this Court deems just and proper.

Dated: New York, New York  
August 21, 2020

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

*Joseph L. Francoeur*

Joseph L. Francoeur

Maxx M. Johnson

*Attorneys for Defendant*

LAURA C. BROWNE, ESQ.

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Our File No. 19715.00005

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TO: All counsel of record via electronic filing.